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REMARKS

Preliminary Remarks

The Non-Final Office Action of April 12, 2005 has been received and reviewed. Claims 1-15 are pending, of which claims 9-15 are allowed, claims 1, 4-8 stand rejected, and claims 2-3 are indicated to contain allowable subject matter. In reply, claim 1 is amended to more clearly describe the invention, and dependent claims 3 and 4 are amended for proper antecedent basis in view of the amendment made to claim 1. These amendments, which were discussed in a telephone interview with the Examiner and the Applicant's representative, Jonathan Thomas, on July 11, 2005, are supported by at least the specification at page 11, line 19 to page 12, line 15. Thus, no new matter is added.

Reconsideration of and withdrawal of all pending rejections in view of the above amendments and following remarks is respectfully requested. All pending claims now being in condition for allowance, the Examiner is respectfully requested to pass the application to issue.

Summary of Interview

The Applicant thanks the Examiner for the courtesies extended during the telephone interview of July 11, 2005. In that interview, the Applicant's representative and the Examiner reviewed and discussed the rejection of claims 1, 4-6, and 8 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No.: 2003/0007108 to Hwang, *et al.* ("Hwang") in view of U.S. Patent Application Publication No.: 2002/0195609A1 to Yoshitake, *et al.* ("Yoshitake"), and further in view of U.S. Patent No.: 6,554,407 to Ikeda, *et al.* ("Ikeda"). Claim 7 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Hwang, Yoshitake, Ikeda, and in further view of U.S. Patent No. 6,600,540 to Yamakita, but depends from claim 1.

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Applicant's representative maintained the prior arguments of record, that Yoshitake's light emitting diode and Ikeda's ink jet printer head were non-analogous to the liquid crystal or electroluminescent display of the invention, that there was no indication that Yoshitake's electrode or Ikeda's electrode was a storage electrode as recited by claim 1, and that in view of Ikeda's disclosure of forming discontinuity portions at portions of electrodes that were proximate defects in an underlying piezoelectric layer, there was no motivation for a skilled artisan to combine the references as suggested by the Examiner.

The Examiner admitted that Yoshitake's light emitting diode and Ikeda's ink jet printer head were different from the liquid crystal display or electroluminescent device of the claimed invention, but took the position that he was interpreting the plain language of claim 1 in its broadest sense, and pointed out that the "isolated end" recited in claim 1 was actually electrically connected to a storage electrode line formed on the substrate, given at least the Applicant's Figures 1 and 4 and accompanying description. The Examiner also indicated that claim 1 would be allowable, if amended to recite that the plurality of branches form both a closed loop and an isolated end electrically connected to a storage electrode line, as described at the specification, page 11, line 19 to page 12, line 4.

Accordingly, the Applicant has amended claim 1 to recite, in pertinent part:

a plurality of storage electrodes formed on the substrate, each storage electrode including a plurality of branches, wherein one of the branches has an isolated end and the remaining branches form a closed loop, and wherein the isolated end is electrically connected by a connector to a storage electrode line formed on the substrate;

Claims 3 and 4 have also been amended for proper antecedent basis in view of the amendment made to claim 1. Because independent claim 1 now includes the subject matter indicated by the Examiner to be allowable, it is respectfully submitted that claim 1 is in condition for

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allowance. Although not specifically mentioned during the interview, it is noted that Yamakita fails to cure the deficiencies of Hwang, Yoshitake, and Ikeda, and that claim 7 is allowable over the cited references at least by virtue of its dependency from allowable claim 1. Thus, each of claims 2-8 are allowable over the cited references at least by virtue of their dependencies from allowable base claim 1. For these reasons, withdrawal of the rejections of claims 1, 4-8 and objection to claims 2-3 are respectfully requested, and the Examiner is respectfully invited to pass these claims to allowance and issue.

Allowable Subject Matter

The Applicant appreciates the indication that claims 9-15 are allowed, and the indication that claims 2-3 contain allowable subject matter. Claim 1 has been amended to incorporate at least the allowable subject matter of claim 3.

35 U.S.C. § 103 Rejections

Claims 1, 4-6, and 8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No.: 2003/0007108 to Hwang, *et al.* ("Hwang") in view of U.S. Patent Application Publication No.: 2002/0195609A1 to Yoshitake, *et al.* ("Yoshitake"), and further in view of U.S. Patent No.: 6,554,407 to Ikeda, *et al.* ("Ikeda"). Claim 7 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hwang, Yoshitake, Ikeda, and in further view of U.S. Patent No. 6,600,540 to Yamakita. These rejections are moot in view of the amendment of claim 1.

Other Matters - Comments on Examiner's Reasons for Indication of Allowability

At page 4, the Examiner stated:

The primary reason for indication of allowability of claims 2 and 3 is the inclusion therein of the limitation that of the longitude [sic] portions of the storage electrodes are connected together by connecting portions.


The Applicant agrees with the Examiner that one or more of the features of claims 2-3 are allowable over the combination of prior art references. The Applicant, however, respectfully disagrees with the Examiner's primary reason for indication of allowability, as it distorts the language of dependent claims 2 and 3. In other words, the language identified by the Examiner is not a feature of claim 2 or claim 3. Moreover, patentability of the invention may not require every feature of the claims or reside in each feature exactly as expressed therein; and the Applicant does not acquiesce in any other of the Examiner's indications of allowability not specifically addressed herein.

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CONCLUSIONS

In view of the foregoing amendments and remarks, the Applicant submits that all of the rejections have been overcome, and that the claims are patentably distinct from the prior art of record and in condition for allowance. The Examiner is respectfully requested to pass the above application to issue, and to contact the undersigned at the telephone number listed below, if needed. The Applicant hereby makes a written conditional petition for extension of time, if required. Please charge any deficiencies in fees and credit any overpayment of fees to **Deposit Account No. 23-1951 (McGuireWoods)**.

Respectfully submitted,



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Date: July 27, 2005

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